

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

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PLAINTIFF
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CIVIL ACTION NO. 08-6311- MLC-TJB

JARED ROSENBLATT,

PLAINTIFF

V

CITY OF NEW BRUNSWICK,

NEW BRUNSWICK POLICE DEPARTMENT,

NEW BRUNSWICK POLICE DIRECTOR,

NEW BRUNSWICK DEPUTY POLICE DIRECTOR,

ANDREW WEISS, POLICE OFFICER MAIMONE,

INVESTIGATOR POWERS,

MIDDLESEX COUNTY PROSECUTOR'S OFFICE

MIDDLESEX COUNTY PROSECUTOR

MIDDLESEX COUNTY PROSECUTOR 'S, OFFICE

CHIEF OF DETECTIVES, JOHN DOES AND

MARY DOES" 1- 30, JOHN SMITHS AND

MARY SMITHS 1 – 30

DEFENDANTS

FIRST AMENDED COMPLAINT

DEMAND FOR TRIAL BY JURY

(CORRECTED)

BY WAY OF COMPLAINT AGAINST THE DEFENDANTS PLAINTIFF SAYS:

OMNIBUS

1. TO THE EXTENT THERE ARE ANY INCONSISTENCIES OR CONTRADICTIONS IN EACH OR ANY OF THE COUNTS OR ALLEGATIONS IN OR OF THIS COMPLAINT OR ANY OTHER MATTERS IN THIS PLEADING THEN THEY ARE TO BE INTERPRETED, CONSTRUED, AND APPLIED IN A MANNER ONLY TO THE BENEFIT AND ONLY TO THE BEST INTERESTS OF PLAINTIFF. THIS INCLUDES, WITHOUT LIMITATION, ALTERNATIVE, INCONSISTENT AND/OR CONTRADICTORY PLEADINGS OR ALLEGATIONS AND/OR MISTATEMENTS OF LAW/AND/OR MISTATEMENTS OF FACTS AND/OR OMISSIONS AND/OR ANYTHING ELSE.

PARTIES.

2. PLAINTIFF JARED ROSENBLATT RESIDED IN THE BORO OF SOUTH RIVER, COUNTY OF MIDDLESEX. STATE OF NEW JERSEY.
3. THE DEFENDANTS RESIDE OR ARE LOCATED IN THE CITY OF NEW BRUNSWICK, COUNTY OF MIDDLESEX, STATE OF NEW JERSEY.
4. THE NAMES OF THE DEFENDANTS DOE AND SMITH ARE FICTITIOUS BECAUSE THE TRUE NAMES OF THESE DEFENDANTS ARE UNKNOWN AND INCLUDE, BUT ARE NOT LIMITED TO, SUPERVISORY POLICE OFFICERS/DETECTIVES/INVESTIGATORS, SUPERIOR POLICE OFFICERS, DETECTIVES/INVESTIGATORS, COMMANDING

POLICE OFFICERS/DETECTIVES/INVESTIGATORS, TRAINING OFFICERS/DETECTIVES/INVESTIGATORS AND ALL OTHER EMPLOYEES, AGENTS, SERVANTS AND ANY AND ALL OTHERS ACTING IN ANY CAPACITY FOR AND/OR ON BEHALF OF ONE OR MORE OF THE DEFENDANT GOVERNMENTAL ENTITIES.

5. ANY DEFENDANT, WHO IS A PERSON, WHETHER IDENTIFIED BY ACTUAL NAME, FICTICIOUS NAME, POSITION, OFFICE, OR OTHERWISE, WAS ACTING ON BEHALF OF ONE OR MORE OF THE DEFENDANT GOVERNMENT ENTITIES AS AN EMPLOYEE, AGENT, SERVANT, REPRESENTATIVE, OR ACTING IN ANY CAPACITY FOR AND/OR ON BEHALF OF ONE OR MORE OF THE DEFENDANT GOVERNMENTAL ENTITIES.
6. THE TRUE FULL NAME OF THE DEFENDANT MAIMONE IS NOT KNOWN AND AS SUCH SHE/HE IS IDENTIFIED AS IN THE SAME MANNER AS IDENTIFIED IN A POLICE REPORT.
7. THE TRUE FULL NAME OF THE DEFENDANT POWERS IS NOT KNOWN AND AS SUCH SHE/HE IS IDENTIFIED HEREIN IN THE SAME MANNER AS IDENTIFIED IN A POLICE REPORT.
8. DEFENDANTS MEANS ONE OR MORE OF THE DEFENDANTS.

JURISDICTION.

9. JURISDICTION IS FOUNDED UNDER 42 U.S.C. Section 1983 & 1988 AND/OR 28 U.S.C. SECTION 1331; SECTION 1343(3); THE FIRST, FOURTH, FIFTH, SIXTH, EIGHTH AMENDMENTS, AND FOURTEENTH AMENDMENTS OF AND TO THE CONSTITUTION OF THE UNITED STATES OF AMERICA, AND/OR THE EQUAL PROTECTION AND/OR

THE DUE PROCESS CLAUSES OF THE UNITED STATES OF AMERICA AND THE NEW JERSEY CONSTITUTION.

10. THE COURT HAS SUPPLEMENTAL JURISDICTION OVER THE STATE LAW CLAIMS PURSUANT TO 28 U.S.C. 1367. VENUE IS PROPER IN THIS DISTRICT UNDER 28 U.S.C. SECTION 1391(b) IN THAT ALL CLAIMS AROSE IN THIS DISTRICT.

STATEMENT OF FACTS.

11. ON OR ABOUT THURSDAY, DECEMBER 21, 2006, AS THE RESULT OF THE UNLAWFUL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AN ILLEGAL SEARCH AND SEIZURE OCCURRED AT AN IN 165 LIVINGSTON AVENUE, ROOM 15, IN THE CITY OF NEW BRUNSWICK, COUNTY OF MIDDLESEX, STATE OF NEW JERSEY.

12. AS THE RESULT OF THE AFORESAID ILLEGAL SEARCH AND SEIZURE, THINGS ALLEGED TO BE CONTRABAND WERE SEIZED.

13. AS A CONSEQUENCE OF THE AFORESAID ILLEGAL SEARCH AND SEIZURE A WARRANT WAS ILLEGALLY ISSUED FOR THE ARREST OF THE PLAINTIFF ILLEGALLY CHARGING HIM WITH VIOLATIONS OF N.J.S. 2C:35-a (1); 2c:35-5b (3); 2C:5-2; 2C:35-10a (1); 2C:35-5a (1); 2C:35-5b (3); 2C:35-5a; 2C:35-7; and 2C:39-3 j.

14. AS A CONSEQUENCE OF THE AFORESAID ILLEGAL SEARCH AND SEIZURE THE PLAINTIFF WAS ILLEGALLY ARRESTED AND INCARCERATED.

15. THE PLAINTIFF WAS INDICTED VIA INDICTMENT NUMBER 07-02-00400-I IN SUPERIOR COURT OF NEW JERSEY, MIDDLESEX COUNTY AS THE RESULT OF THE ILLEGAL SEARCH AND SEIZURE ILLEGALLY CHARGING HIM WITH VIOLATIONS OF N.J.S. 2C:35-a(1); 2c:35-5b(3); 2C:5-2; 2C:35-10a(1); 2C:35-5a(1); 2C:35-5b(3); 2C:35-5a; 2C:35-7; and 2C:39-3 j.

16. ON 25 JUL 07, THE HONORABLE DEBORAH J. VENEZIA, UDGEOF THE SUPERIOR COURTOF NEW JERSEY DETERMINED AND RULED THAT THE AFORESAID SEARCH AND SEIZURE WAS ILLEGAL AND SUPPRESSED ALL EVIDENCE OBTAINED AS THE RESULT OF SAID ILLEGAL SEARCH AND SEIZURE

17. THE AFORESAID INDICTMENT TOGETHER WITH ALL CRIMINAL CHARGES RELATING TO AND CONCERNING IT WERE ORDERED AND ADJUDGED DISMISSED IN THE SUPERIOR COURT OF NEW JERSEY ON 25 JUL 07 AS THE DIRECT RESULT OF THE DETERMINATION BY THE COURT THAT THE SEARCH AND SEIZURE OF AND ON OR ABOUT 21 DECEMBER 2006 WAS ILLEGAL.

18. AS A CONSEQEUNCE OF THE AFORESAID ILLEGAL SEARCH AND SEIZURE THE PLAINTIFF SUFFERED AND CONTINUES TO SUFFER FROM DAMAGES, INJURIES, LOSSES, AND OTHER ADVERSE EFFECTS AS WELL AS INCURRING ATTORNEYS FEES, COUNSEL FEES, COSTS, AND EXPENSES.

ALLEGATIONS

19. THE ILEGAL CONDUCT OF THE DEFENDANTS COMMENCED ON OR ABOUT 21 DEC 06 IN THE CITY OF NEW BRUNSWICK AND CONTINUED THEREAFTER ON A CONTINUING BASIS.

20. THE PLAINTIFF SUFFERED THE ADVERSE CONSEQUENCES OF THE ILLEGAL CONDUCT.

21. SAID ILLEGAL CONDUCT INCLUDED WITHOUT LIMITATION VIOLATIONS OF CIVIL RIGHTS, VIOLATIONS OF THE FIRST, FOURTH, FIFTH, SIXTH, EIGHTH AND FOURTEENTH AMENDMENT OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA, VIOLATIONS OF ARTICLE I SECTIONS 1, 2a, 5, 6, 7, 8, 10, 11, 12, OF THE CONSTITUTION OF THE STATE OF NEW JERSEY, FALSE POLICE REPORTS, FALSE OFFICIAL REPORTS, FALSE INFORMATION, FALSE SWEARING INCUDING BUT NOT LIMITED TO GRAND JURY PROCEEDINGS, PERJURY IN AND AT GRAND JURY PROCEEDINGS,FALSE SWEARING IN AND AT HEARINGS IN THE SUPERIOR COURT OF NEW JERSEY, PERJURY IN AT HEARINGS IN THE SUPERIOR COURT OF NEW JERSEY, AND SUCH OTHER MATTERS AS DISCOVERY/INVESTIGATION REVEALS.

22. AS THE RESULT OF ILLEGAL CONDUCT ON OF AND BY THE DEFENDANTS, ONE OR MORE OF THEM, ON OR ABOUT 21 DEC 06 AND 22 DEC 06, THE PLAINTIFF WAS ILLEGALLY CRIMINALLY CHARGED, ARRESTED, DETAINED AND INCARCERATED, AND OTHERWISE SUBJECTED TO AND SUFFER OTHER MATTERS, AND AS THE CONSEQUENCE, SUFFERED ALL OF THE ADVERSE CONSEQUENCES CAUSED BY SUCH UNLAWFUL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM.

23. AT ALL TIME RELEVANT THE DEFENDANTS WEISS, MAIMONE , POWERS, NEW BRUNSWICK POLICE DIRECTOR, NEW BRUNSWICK DEPUTY POLICE DIRECTOR, MIDDLESEX COUNTY PROSECUTOR'S OFFICE CHIEF OF DETECTIVES, MIDDLESEX COUNTY PROSECUTOR, AND ONE OR MORE OF THE DOE AND SMITH DEFENDANTS, ACTED AS THE AGENTS, SERVANTS EMPLOYEES, REPRESENTATIVES, AND/OR IN ANY OTHER CAPACITY OF AND/OR ON BEHALF OF THE DEFENDANT CITY OF NEW BRUNSWICK AND/OR THE DEFENDANT NEW BRUNSWICK POLICE DEPARTMENT AND/OR THE COUNTY OF MIDDLESEX AND/OR THE MIDDLESEX COUNTY PROSECUTOR'S OFFICE AND/OR THE MIDDLESEX COUNTY PROSECUTO

24. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED ILLEGALLY BEING CHARGED.

25. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED ILLEGAL APPLICATION(S) FOR AND THE SETTING OF AND THE IMPOSITION OF BAIL.

26. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED THE ILLEGAL ISSUE OF WARRANTS.

27. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED ILLEGAL ARREST.

28. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED ILLEGAL IMPRISONMENT.

29. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED ILLEGAL INCARCERATION.

30. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED FALSE POLICE REPORTS.

31. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED FALSELY SWORN DOCUMENTS.

32. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED, FALSE, FALSELY SWORN, AND PERJURED TESTIMONY AND EVIDENCE AT GRAND JURY PROCEEDINGS IN THE SUPERIOR COURT OF NEW JERSEY.

33. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED FALSE, FALSELY SWORN AND PERJURED TESTIMONY AND EVIDENCE AT SUPPRESSION HEARINGS IN THE SUPERIOR COURT OF NEW JERSEY.

34. THE PLAINTIFF WAS SUBJECTED TO AND SUFFERED ANY AND ALL OTHER ILLEGAL CONDUCT, ILLEGAL ACTS ILLEGAL INCIDENTS AND CONDUCT NOT SEPCIFICALLY SET FORTH HEREIN AS SUPPORTED BY THE FACTS/EVIDENCE.

35. THE RESPECTIVE DEFENDANT GOVERNMENTAL ENTITIES ARE RESPONSIBLE FOR THE CONDUCT OF THEIR RESPECTIVE AGENTS, SERVANTS, EMPLOYEES, REPRESENTATIVES AND ALL OTHERS ACTING IN ANY OTHER CAPACITYFOR AND/OR ON THEIR/ITS BEHALF

37. THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE ORMORE OF THEM INCLUDES WITHOUT LIMITATION, UNLAWFULLY ACTING UNDER THE COLOR OF LAW. AND OTHERWISE ACTING UNLAWFULLY.

FIRST COUNT.

38. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FIRST, FOURTH, FIFTH, SIXTH, EIGHTH, AND FOURTEENTH AMENDMENTS THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

39. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY, DEPRIVATION OF HIS FREEDOM, DEPRIVATION OF HIS PURSUIT OF HAPPINESS, DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART, AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

40. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WTH INTEREST.

SECOND COUNT.

41. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTIONS 1, 2a, 5, 6, 7, 8 10,11 AND 12 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

42. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES,

SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS THERETO OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS THERETO OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART, AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRD COUNT.

43. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS RESULTED IN THE PLAINTIFF BEING UNLAWFULLY ARRESTED.

44. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY, DEPRIVATION OF HIS FREEDOM, DEPRIVATION OF HIS PURSUIT OF HAPPINESS, DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS THERETO OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS THERETO OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

45. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FOURTH COUNT.

46. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS RESULTED IN THE PLAINTIFF BEING UNLAWFULLY DETAINED, IMPRISONED, AND INCARCERATED.

47. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS THERETO OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE

CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

48. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FIFTH COUNT.

49. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS RESULTED IN THE PLAINTIFF BEING MALICIOUSLY AND OTHERWISE UNLAWFULLY PROSECUTED.

50. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF

HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS THERETO OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS THERETO OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

51. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

SIXTH COUNT.

52. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS WAS WILLFUL AND/OR WANTON AND/OR RECKLESS AND/OR IN RECKLESS DISREGARD OF PLAINTIFF'S RIGHTS.

53. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

54. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

SEVENTH COUNT.

55. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES GROSS NEGLIGENCE.

56. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE

CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

57. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

EIGHTH COUNT.

58. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES, NEGLIGENCE, CARELESSNESS OR OTHERWISE UNLAWFUL CONDUCT

59. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF

HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

60. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

NINTH COUNT.

61. THE DEFENDANTS, ONE OR MORE OF THEM, VIOLATED THE FOURTH AMENDMENT OF THE CONSITIUTION OF THE UNITED STATES OF AMERICA.

62. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

63. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TENTH COUNT.

64. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.

65. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE

CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

66. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

ELEVENTH COUNT.

67. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS.

68. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF

HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

69. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWELVTH COUNT.

70. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES AN INTERFERNECE WITH PLAINTIFF'S RIGHT OF DUE PROCESS OF LAW AS PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE UNITED STATES OF AMERICA.

71. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT

OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

72. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTEENTH COUNT.

73. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES AN INTERFERENCE WITH PLAINTIFF'S RIGHT OF DUE PROCESS OF LAW AS PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE STATE OF NEW JERSEY.

74. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER

DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

75. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FOURTEENTH COUNT.

76. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES A DENIAL OF PLAINTIFF'S RIGHT OF DUE PROCESS OF LAW AS PROVIDED BY AND

UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE UNITED STATES OF AMERICA.

77. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

78. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES,

COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FIFTEENTH COUNT.

79. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES A DENIAL OF PLAINTIFF'S RIGHT OF DUE PROCESS OF LAW AS PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE STATE OF NEW JERSEY.

80. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY

AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

81. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

SIXTEENTH COUNT.

82. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES LIBEL.

83. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL

OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

84. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

SEVENTEENTH COUNT.

85. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES FALSE LIGHT.

86. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

87. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

EIGHTEENTH COUNT

88. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES INTERFERENCE WITH PLAINTIFF'S RIGHT TO EQUAL PROTECTION OF AND UNDER THE LAW PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE UNITED STATES OF AMERICA.

89. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE

CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

90. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

NINETEENTH COUNT

91. THE ILLEGAL CONDUCT OF ONE OR MORE DEFENDANTS CONSTITUTES DENIAL OF PLAINTIFF'S RIGHT TO EQUAL PROTECTION UNDER AND OF THE LAW PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE UNITED STATES OF AMERICA.

92. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

93. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES,

REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTIETH COUNT.

94. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES DENIAL OF PLAINTIFF'S RIGHT OF AND TO EQUAL PROTECTION UNDER AND OF THE LAW PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE STATE OF NEW JERSEY.

95. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE

CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING
THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE
CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT
OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER
WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

96 WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND
ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES,
COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN
NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES,
REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS'
FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER
WITH INTEREST.

TWENTY FIRST COUNT.

97. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES
INTERFERENCE WITH PLAINTIFF'S RIGHT OF AND TO EQUAL PROTECTION UNDER
AND OF THE LAW PROVIDED BY AND UNDER THE CONSTITUTION AND
AMENDMENTS THERETO AND LAWS OF THE STATE OF NEW JERSEY.

98. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF
THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN
NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES,
SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF
HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF

HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

99. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY SECOND COUNT.

100. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS
CONSTITUTES INVASION OF PRIVACY.

101. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR
MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE
PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES,
DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME,
DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS
PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY,
AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE
DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER
DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS,
FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE
CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE
VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE
CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY
AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE
LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE
CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING
THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE
CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT
OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER
WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

102. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY THIRD COUNT.

103. THE DEFENDANTS CITY OF NEW BRUNSWICK AND NEW BRUNSWICK POLICE DEPARTMENT, NEGLIGENTLY, CARELESSLY AND OTHERWISE UNLAWFULLY HIRED, EMPLOYED, TRAINED, SUPERVISED, AND OTHERWISE FAILED TO EXERCISE ANY AND ALL OTHER RESPONSIBILITIES IN REGARD TO ITS DEFENDANT AGENTS, SERVANTS, EMPLOYEES, AND REPRESENTATIVES HEREIN RESULTING IN THE ILLEGAL CONDUCT OF SAID DEFENDANT AGENTS, SERVANTS, EMPLOYEES, REPRESENTATIVES AND ALL OTHERS ACTING ON ITS/THEIR BEHALF

104. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY,

AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

105. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY FOURTH COUNT.

106. THE DEFENDANTS MIDDLESEX COUNTY, MIDDLESEX COUNTY PROSECUTOR'S OFFICE AND MIDDLESEX COUNTY PROSECUTOR NEGLIGENTLY, CARELESSLY AND OTHERWISE UNLAWFULLY HIRED, EMPLOYED, TRAINED, SUPERVISED, AND OTHERWISE FAILED TO EXERCISE ANY AND ALL OTHER RESPONSIBILITIES IN REGARD TO ITS DEFENDANT AGENTS, SERVANTS, EMPLOYEES, AND REPRESENTATIVES HEREIN RESULTING IN THE ILLEGAL CONDUCT OF SAID DEFENDANT AGENTS, SERVANTS, EMPLOYEES, REPRESENTATIVES AND ALL OTHERS ACTING ON ITS/THEIR BEHALF

107. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE

CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING
THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE
CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT
OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER
WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

108. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES
AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES,
COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN
NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES,
REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS'
FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER
WITH INTEREST.

TWENTY FIFTH COUNT.

109. THE DEFENDANTS, ONE OR MORE OF THEM, VIOLATED ARTICLE I SECTION 7
OF THE CONSTITUTION OF THE STATE OF NEW JERSEY.

110. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR
MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE
PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES,
DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME,
DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS
PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY,

AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS

111. OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

112. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY SIXTH COUNT.

113. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FIRST AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

114. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

115. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY SEVENTH COUNT.

116. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FOURTH AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

117. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES,

DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

118. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY EIGHT COUNT.

119. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FIFTH, AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

120. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

121. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY NINTH COUNT.

122. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND SIXTH AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

123. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES,

DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

124. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WTH INTEREST.

125. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FIRST, FOURTH, FIFTH, SIXTH, EIGHT, AND FOURTEENTH AMENDMENTS THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

126. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT

OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

127. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTIETH COUNT.

128. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND EIGHTH AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

129. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS

PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

130. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY FIRST COUNT.

131. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND EIGHTH AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

132. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

133. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY FIRST COUNT.

134. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FOURTEENTH AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

135. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES,

DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

136. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WTH INTEREST.

THIRTY SECOND COUNT.

137. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTION S TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING ARTICLE I SECTION 1 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

138. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

139. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY THIRD COUNT.

140. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 2a AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

141. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES,

DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

142. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WTH INTEREST.

THIRTY FOURTH COUNT.

143. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTION S TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 5 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

144. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

144. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY FIFTH COUNT.

145. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 6 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

146. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES,

DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

147. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WTH INTEREST.

THIRTY SIXTH COUNT.

148. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTION S TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTIONS 7 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

149. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

150. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY SEVENTH COUNT.

151. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTIONS 8 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

152. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES,

DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

152. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WTH INTEREST.

THIRTY EIGHTH COUNT.

153. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTION S TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 10 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

154. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

155. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY NINTH COUNT.

156. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTION S TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 10 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

157. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES,

DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

158. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FORTIETH COUNT.

159. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTION S TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 11 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

160. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

161. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FORTY FIRST COUNT.

162. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 12 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

163. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES,

DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA,THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

164. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WTH INTEREST.

BY: GERALD GORDON, ATTORNEY FOR PLAINTIFF

S/GERALD GORDON, ATTORNEY FOR PLAINTIFF DATED 24 SEP 2009

JURY DEMAND

TRIAL BY JURY OF TWELVE IS DEMANDED.

S/GERALD GORDON, ATTORNEY FOR PLAINTIFF DATED 24 SEP 2009

CERTIFICATION

I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE AND BELIEF THAT THERE IS NO OTHER ACTIONS AT LAW OR OTHERWISE PENDING IN REGARD TO THE SUBJECT MATTER OF THIS COMPLAINT AND THAT THERE ARE NO OTHER PARTIES THAT SHOULD BE JOINED IN THIS MATTER.

S/GERALD GORDON, ATTORNEY FOR PLAINTIFF DATED 24 SEP 2009